



Nye County

Nuclear Waste Repository Project Office

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13-002 DL (L)

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Patrick Young
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Subject: Comments on TPP Renewable Portfolios.

Comment:

Nye County, Nevada, suggests renewable energy generators in the Valley Electric Association (VEA) Interconnection Queue Projects be assigned a CPUC or a CEC ID number, and their latitudes and longitudes and other site descriptors be recorded and considered in the same manner as other in-state renewable resources.

Background:

The National Renewable Energy Lab as found the solar resource in Nye County, Nevada, is of the highest quality, nationally. Solar developers in the southern Nye area have requested Right-of-ways on public land or are pursuing projects on private land for solar generation totaling as much as 3000 MW. Many of these projects are in the Valley Electric Association (VEA) interconnection queue and are, or will be, in a CAISO Cluster Study Group; however, since the majority of these projects have not yet obtained Power Purchase Agreements, the CPUC has little if any data about these projects and their potential impact on the regional electrical transmission grid.

According to California Senate Bill X1-2, renewable resources directly connected to a California balancing area are considered "Bucket 1 Resources" and receive the highest priority ranking. As of January 1, 2013, VEA became a member of the California Independent System of Operators (CAISO) which means VEA transmission customers qualify for "Bucket 1" designation.


Nye County requests renewable energy generators in the VEA Queue be treated the same as in-state projects in accordance with SBX1-2. Currently, these projects are unintentionally disadvantaged because their location and associated environmental data is not recorded nor considered during prioritization of possible portfolio projects by the 33% RPS Calculator. Nye County requests these projects be assigned CEC and/or CPUC identification numbers and have their respective locations identified (latitude and longitude) and environmental attributes recorded so these projects may receive the same treatment as other domestic resources by the 33% RPS Calculator.

Possible benefit to the validity and sensitivity of CPUC TPP studies:

By assigning identification numbers to renewable energy resources in the VEA Queue, the environmental score for these resources can be more accurately determined allowing them to compete fairly with other domestic resources. While it may be too late for these projects to be included in CPUC planning

scenarios for the current study period, Nye County hopes their omission from the CPUC/CEC project list may be remedied so these projects are included in future transmission and RPS studies.

Sincerely,



Darrell Lacy, Director
Community Development